

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

NAU COUNTRY INSURANCE
COMPANY,

Plaintiff,

v.

FRANK M. WOOD, as the Director
of the National Appeals Division,
and ALT'S DAIRY FARM, LLC,

Defendants.

Case No. 1:23-cv-00127

Hon. Janet T. Neff
U.S. District Court Judge

Hon. Ray Kent
U.S. Magistrate Judge

DEFENDANT FRANK M. WOOD'S MOTION TO STAY

Defendant Frank M. Wood, Director of the National Appeals Division of the U.S. Department of Agriculture (USDA), in his official capacity and by and through his attorneys, Mark Totten, United States Attorney for the Western District of Michigan, and Laura A. Babinsky, Assistant United States Attorney, moves this Court to stay the summary judgment briefing schedule pending its decision on his anticipated motion to remand. The basis for this motion is set forth in the accompanying memorandum.

WHEREFORE, Defendant Frank M. Wood respectfully requests that this Court stay the summary judgment briefing schedule pending its decision on the anticipated motion to remand.

Respectfully submitted,

MARK TOTTEN
United States Attorney

Dated: October 26, 2023

/s/ Laura A. Babinsky
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